

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORY
TO UNITED STATES POSTAL SERVICE
WITNESS W. ASHLEY LYONS
(DFC/USPS-T1-1)

October 25, 1996

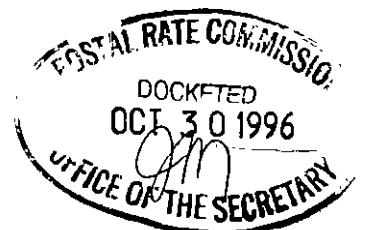
Pursuant to section 25 of the Rules of Practice and section 2(D) of the Special Rules of Practice, I, Douglas F. Carlson, hereby submit a follow-up interrogatory to United States Postal Service witness W. Ashley Lyons. This interrogatory concerns Response of Witness Lyons to Presiding Officer's Information Request No. 4 (Question 8).

Although the Postal Service filed this response on October 15, I did not receive the response until October 23. I am mailing this follow-up interrogatory on October 25, within seven days of receipt of the original response, as required by section 2(D) of the Special Rules of Practice.

Respectfully submitted,

Dated: October 25, 1996


DOUGLAS F. CARLSON



DFC/USPS-T1-1. Please refer to Response of Witness Lyons to Presiding Officer's Information Request No. 4 (Question 8).

a. For this question, please assume the following: (1) The Postal Service believes that some nonresident boxholders would be willing to pay a higher fee for their box than the Postal Service presently charges them; (2) The Postal Service's only goal in proposing a nonresident fee is to increase its total revenue by charging a fee to nonresident boxholders that would be higher than the fee that presently applies to nonresident boxholders. Do you believe that a boxholder who initially rejected a fee increase would subsequently accept the fee increase if he understood that the fee increase were motivated solely by the Postal Service's desire to increase its revenues? If your answer is yes, please explain fully and cite any studies on which you rely in support of your answer.

b. For this question, please assume the following: (1) The Postal Service concludes that nonresident boxholders impose greater costs on the Postal Service than resident boxholders; (2) The Postal Service's only goal in proposing a nonresident fee is to recover the additional costs that nonresident boxholders impose on the Postal Service; (3) The nonresident boxholder to which the following sentence refers does not, by any objective or subjective measure, impose

costs on the Postal Service greater than the average cost imposed by resident boxholders in the post office in which the nonresident has his post-office box. Under these three assumptions, do you believe that a nonresident boxholder who initially rejected a fee increase would subsequently accept the fee increase if he were told that the nonresident fee was being imposed to recover the additional costs that nonresident boxholders impose on the Postal Service? If your answer is yes, please explain fully and cite any studies on which you rely in support of your contention.

c. The three assumptions in (b) apply to this question. Do you believe that a nonresident boxholder who initially rejected a fee increase would subsequently accept the fee increase if he were told that (1) the nonresident fee was designed to recover the additional costs that nonresident boxholders impose on the Postal Service and (2) no studies were conducted to measure and compare the costs that resident and nonresident boxholders impose on the Postal Service? If your answer is yes, please explain fully and cite any studies on which you rely in support of your contention.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the Rules of Practice and sections 3(B)(3) and 3(C) of the Special Rules of Practice.



DOUGLAS F. CARLSON

October 25, 1996
Emeryville, California